



# Privacy Policy Introduction

## Document Change Record

Date	Version	Author	Change Details
5/24/2023	1	Marc Cohen/Iain Struan/Ramesh Maturu	Initial Document



Pyramid Consulting, Inc., and our operating affiliate divisions (Genspark™ and Celsior Technologies™) is committed to protecting and respecting your privacy. Accordingly, we have developed this Privacy Notice for you to understand how we collect, use, communicate, disclose, and make use of personal data through our website.

- The terms “we,” “us,” and “our” refer to Pyramid Consulting, Inc., and its affiliates (the “Company”).
- The term “Site” refers to [www.pyramidci.com](http://www.pyramidci.com); [www.genspark.net](http://www.genspark.net); [www.celsiortech.com](http://www.celsiortech.com)
- The terms “user,” “you,” and “your” refer to Site visitors, candidates, and any other users of the Site.

Use of the Site, including all information presented herein and all online services provided by the Company, is subject to this Privacy Notice.

## Who are we?

Pyramid Consulting, Inc. is an award-winning, global staffing company, and one of the leading and most reliable sources of the best total talent and technology services in the industry. We are committed to satisfying the needs of all customers: our clients, consultants, and employees.

As a customer partner-for-life, through our four divisions, we provide the best in people resources, utilize the latest technology in our IT and workforce transformation projects, and bring subject-matter expertise, all to help our customers achieve success.

## Who does this Privacy Notice protect?

This Privacy Notice applies to all Site visitors, candidates, and all other users of the Site. By using the Site or any of its services, you agree to this Privacy Notice, without modification, and acknowledge reading it.

## What information do we collect?

When you use or register with the Site, some of the data that we collect and receive from you is personal data, which means that it is information that could personally identify you (“Personal Data”).



The categories of Personal Data we may request include your name and contact information (email address, address, and telephone number). Depending on the nature of your inquiry or activities on the Site, we may also ask for your job search criteria and preferences, your employment experience, educational history, your skills in various areas, reference information, background information, and other information contained in your resume, and any login ID and password created by you. It is also possible to upload your resume/CV, cover letters, and any other attachments you may wish us to consider. The Site also utilizes functional cookies to track your online activities, including, but not limited to, registration, submissions, information requests and for analytic purposes.

The Company currently does not recognize and respond to Do Not Track Signals. If we do so in the future, we will revise this Privacy Notice to describe how this is done.

## Why do we process your Personal Data?

We use your Personal Data for our business and activities, and in our efforts to expand and improve our business. Generally, we use Personal Data and other data collected through the Site to register you with the Site, to provide you with information regarding employment opportunities and career-related information, and to otherwise provide you with requested information or services.

We may also from time to time use your Personal Data to send you automated email messages regarding our services, including employment information. You have the right to ask us not to process your Personal Data for marketing purposes and can opt out of receiving such email messages by sending an email with this request to [dpo@pyramidci.com](mailto:dpo@pyramidci.com) from each e-mail account that you would like to opt-out from.

## With whom do we share your Personal Data?



The Company may disclose Personal Data to third parties. The disclosure to third parties would occur in the following circumstances:

- We will disclose information to our clients when necessary and appropriate in connection with the provision of staffing and recruitment services.
- We may disclose information to companies and individuals we employ to perform business functions and services on our behalf.
- We may disclose information to the extent necessary or appropriate to government agencies, advisors, and other third parties in order to comply with applicable laws, the service of legal process, or if we reasonably believe that such action is necessary to: (a) comply with the law requiring such disclosure; (b) protect the rights or property of the Company; (c) prevent a crime or protect national security' or (d) protect the personal safety of the users or the public.

## What rights do you have?

We respect your right to review and request changes to your Personal Data. The amount of Personal Data you are required to provide when requesting our services is consistent with the Company's interests in providing our services to you. The Company complies with applicable data protection laws and regulations.

We process Personal Data about you for the purposes set out in this Privacy Notice, including, but not limited to providing recruitment, placement, employment, or outsourcing services; operating our business; complying with our legal and contractual obligations; and fulfilling other legitimate interests of the Company.

## Changes to this Privacy Notice

We reserve the right to update this Privacy Notice periodically to reflect changes in our privacy practices and legal updates. Any changes we may make to our Privacy Notice in the future will be posted on this page and are immediately binding without any requirement for notice.



## How to contact us?

If you have any questions or comments about this Privacy Notice, or if you would like to exercise your rights, please send an email to [dpo@pyramidci.com](mailto:dpo@pyramidci.com), or write to: Data Privacy Officer – Pyramid Consulting, Inc., 3060 Kimball Bridge Road, Suite 200, Alpharetta, GA 30022



# Web Privacy

## Document Change Record

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May 2020	0.1	Grayson Wolfe	Initial Draft
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## Introduction

### **Please Read Carefully.**

Pyramid Consulting, Inc. (USA), Pyramid Consulting, Inc. (Canada), Pyramid IT Consulting Pvt. Ltd. (India) and its subsidiaries (Singapore, UK, Mexico), affiliated divisions – Celsior Technologies®, Genspark®, Celsior Technologies Pvt (India), Pyramid Systech Pvt (India), The Pyramid Companies, Inc. and its subsidiaries (UK, Ireland), Pyramid Dynamics, S. de R.L. de C.V (Mexico) together with its subsidiaries, (collectively, “Pyramid”, “we”, “us” or “our”), recognize the importance of protecting your privacy. Our Web Privacy and Cookie Policy applies to your use of our public websites, as well as your personal and professional interactions with Pyramid employees. This Policy is designed to assist you in understanding how we collect, process, safeguard and disclose your personal information and your choices in making informed decisions when using the Site. We also describe how you can contact us about our privacy practices.



# Our Web Privacy Policy

## Your Acceptance Through Express Consent

This Web Privacy Policy describes how Pyramid collects, uses, and discloses certain personal information obtained through this Site and other Pyramid Consulting, Inc. business activity. This Privacy Policy is incorporated into, and is part of, the Terms and Conditions, which govern your use of Pyramid Consulting Inc.'s Properties, Services, Amenities, and this Site in general.

## The Types of Information We Collect

The types of personal information we may collect from you, or you may choose to provide include:

- Contact information
- First name / last name
- Email
- Phone
- Job class
- Job type
- Advertising / discovery source
- Any additional notes they choose to provide.
- Online identifiers attached to your device or account.
- Information about your use of our websites
- Your social media interactions with us (for example, when you “like” a post on social media platforms)
- Technical information from advertisements we place on third party websites (such as your IP address, browser type and version, device identifiers, location and time zone setting)

## How We Use Your Information

### **Our Communications to You – Offerings Where You Expressed Interest:**

When you visit our Site, you may be required to register with us or be requested to provide us with personal information. When you provide us with this information, we may use it to contact you about the opportunities in which you have expressed an



interest. Pyramid has a legitimate business interest to use the personal information we collect from you to provide such requested information. Where we have relied on your express consent, however, if you tell us that you do not want us to use this information as a basis for further contact with you (by contacting us and requesting our opt-out process), we will comply within 24 hours.

### **Our Communications to You – Events, Newsletters and Marketing:**

In order to keep our candidates informed about our latest news, communities, and events, we may send texts, e-mails and marketing communications to the phone numbers or email address provided to us while registering on our Site or requesting information from us. Pyramid complies with applicable laws when using your personal information for this purpose, and where applicable relies on your express consent. If you opt-in to any of our email lists, newsletters or other promotional offerings and later change your mind, you may unsubscribe by following the instructions contained in each email we send to you.

### **General Business Uses:**

We may also use the personal information we obtain about you for the following purposes:

- Evaluating and improving our business reach – including decisions about where to develop new communities, the amenities needed and pricing.
- Improving our business processes
- Candidate Satisfaction Surveys
- Enforcing our other legal rights

### **Information Provided to Us About You by Third Parties**

#### **Third-Party Content:**

We may present or embed content on our Site, such as resumes, that is provided by our third-party vendors. This content may contain links to other sites not operated by Pyramid or may request personal information. For example, this content may ask for an email address to subscribe to alerts or share a listing with a friend. This information is collected by our vendors and not by us. In some cases, these vendors may share the personal information they collect from you with us. We share and are co-responsible for the privacy practices of our vendors. We encourage you to review their privacy policies to understand how they will use and share the personal information you provide to them.

#### **Third-Party Usage:**

You may also separately share your information with other Web sites or entities, such as those that create professional marketing lists, to receive special offers and



promotions from their affiliates. These Web sites or entities may share your information with us. Pyramid is co-responsible for shared data between us and our partners. We do our best to collect your consent from our partners and will not use your data if consent has not been collected and shared legally.

### **Marketing Data:**

Where applicable law allows, we will purchase marketing data from third parties and add it to our existing user database to better target our advertising and to provide pertinent offers in which we think you would be interested. We may also associate this marketing data with the personally identifiable information that you provide us. In all cases we will collect the data source and your consent records from these partners.

## **Third Parties with Whom We Share Your Personal Information**

### **Third Parties for Retargeting Advertising:**

We will, in some cases, share information about how you use our Site with third-party vendors to present you with more relevant advertising. For example, our vendors may track your browsing activity on our Site using cookies to show you ads based on your interests when you browse the Web or use social media. Our vendors will, in some cases, also share information about your browsing activity on our Site with us for analytics purposes. Pyramid relies on your express consent for such processing of your personal information. More information on these cookies, including how to provide or revoke your consent, may be found in our Cookie Policy below.

### **Service Providers:**

We may share your personal information with companies acting as our authorized agents in providing our services, including the following categories of service provider:

- infrastructure and IT service providers, including cloud service providers.
- marketing, advertising, and communications agencies
- external auditors and advisors
- Utility companies
- construction service supplies such as painting contractors
- candidate service providers such as pest control and appliance repair
- cookie analytics providers
- online advertisers
- providers of website testing / analytics services

Each service provider must agree to implement and maintain reasonable security procedures and practices appropriate to the nature of your information in order to



protect your personal information from unauthorized access, destruction, use, modification, or disclosure. Because we operate globally, we may transfer your information to other countries or jurisdictions. Binding Corporate Rules manage these transfers. If we make such a transfer, we will, or our vendors will, as applicable, provide the proper safeguards required by applicable law to ensure that your information is protected. More information on International Data Transfers of your personal information is below.

Where we share your personal information for our legitimate interests you can object to this disclosure. Please be aware that when you object to disclosure of your personal information for Pyramid's legitimate interests it may affect the services we provide to you. More information on your rights is below.

### **Legally Compelled Disclosure:**

We will also disclose your personal information when required to do so by law, for example, in response to a court order or a subpoena or other legal obligation, taxation authorities, in response to lawful requests by public authorities, including to meet national security or law enforcement agency's requirements, or in special cases when we have reason to believe that disclosing your personal information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with our rights or property.

## **International Data Transfers**

### **Processing in the US and Elsewhere by Registration on This Site**

Pyramid is a business that operates in the United States of America, Canada, Mexico, the United Kingdom, India, Philippines, and the EU. We may transfer the personal information we collect about you to recipients, and your personal information may be stored and processed in countries other than the country in which the information was originally collected, including the United States and elsewhere. When we transfer your information to other countries, we will protect your information as described in this Policy with respect to data transfers outbound from the European Economic Area (EEA) to the United States:

- Pyramid has executed EU Binding Corporate Rules with respect to personal information collected in the European Economic Area and transferred to Pyramid in the United States and elsewhere.

Pyramid Consulting, Inc. is proud of our compliance, cybersecurity, and data privacy programs. We invite you to contact us to ask questions and find out more about our data management practices.

**Disclosure and Liability for Onward Transfer:**

Pyramid is required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Pyramid may, as disclosed above in Third Parties with Whom We Share Your Personal Information, transfer personal information onward to third parties. Pyramid remains liable under the Privacy Shield Principles if a third-party process such personal information in a manner inconsistent with the principles, unless we prove we are not responsible for the event giving rise to the damage.

**Independent Recourse of Privacy Shield Complaints:**

In compliance with the EU-US and Swiss-US Privacy Shield Principles, Pyramid commits to resolve complaints about our collection or use of your personal information. United Kingdom candidates with inquiries or complaints regarding our Privacy Shield policy should first contact Pyramid at: [DPO@PyramidCI.com](mailto:DPO@PyramidCI.com)

**Security**

Pyramid endeavors to protect the security of your personal information and your choices for its intended use. We use Secure Socket Layers or SSL technology to protect the transmission of sensitive personal information such as your Personally Identifying Information. We store your personal information on a secure server and use systems and procedures that are designed to protect the personal information we collect from unauthorized access, destruction, use, modification, or disclosure.

Although we will take (and require our third-party providers to take) commercially reasonable security precautions regarding your personal information collected from and stored on the Site, due to the open nature of the Internet, we cannot guarantee that any of your personal information stored on our servers, or transmitted to or from a user, will be free from unauthorized access, and we disclaim any liability for any theft or loss of, unauthorized access or damage to, or interception of any data or communications. By using the Site or other Pyramid services, you acknowledge that you understand and agree to assume these risks.

**How Long We Retain Your Personal Information**

We will only retain the personal information we collect about you for as long as necessary for the purpose for which that information was collected, and to the extent permitted by applicable laws. We take steps to ensure that when we no longer need to use your personal information, we remove it from our systems and records and/or take steps to anonymize it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).

## Your Privacy Rights

### Your Right to Be Forgotten

Pyramid Consulting, Inc. retains candidate and applicant data to comply with laws and regulations across a multitude of jurisdictions, and such data is kept for at least 90 days or longer, based on the last point of contact. Certain data artifacts are required to be retained in keeping with US, Canadian, EU, and other laws and regulations such as racial makeup, age, sex/gender, and credit or criminal records. All candidates residing within or subject to the European Union Jurisdiction may request an “Article 17” action under the GDPR at any time. We will comply within 24 hours. The data we retain will be anonymized, deleted, or obfuscated such that it no longer identifies you in any specific way.

### Your Right to Request Modification or Correction of Your Data

Mistakes Happen. If you notice that we have made a mistake in your data, please let us know. You have the right to request a copy of all the data we have about you, and if you notice an error request that we fix it. This process is handled through our Data Protection Officer. You may contact us:

- a) by *telephone*, at +1 678 514 3500
- b) by following the *Opt-Out or unsubscribe instruction* contained in the body of any marketing e-mail from us
- c) by sending us an *e-mail* at [DPO@PyramidCI.com](mailto:DPO@PyramidCI.com), including a copy of the e-mail you have received and by typing “Remove” in the subject line of your e-mail
- d) by *mail*:

Pyramid Consulting Inc.  
Attention: Pyramid Data Protection Officer  
3060 Kimball Bridge Rd. Suite 200  
Alpharetta, GA 30022 USA

### Marketing Communications:

When you register on this Site, we may ask you to select whether you would like to receive text, email social media connections and electronic communications from us such as offers, news, event invitations and other promotional communications. You may withdraw your consent or opt-out of receiving such communications at any time by contacting us as described below:

- a) by *telephone*, at +1 678 514 3500
- b) by following the *Opt-Out or unsubscribe instructions* contained in the body of any marketing e-mail from us
- c) by sending us an *e-mail* at [DPO@PyramidCI.com](mailto:DPO@PyramidCI.com), including a copy of the e-mail you have received and by typing “Remove” in the subject line of your e-mail.
- d) by *mail*:

Pyramid Consulting Inc.



Attention: Pyramid Data Protection Officer  
3060 Kimball Bridge Rd. Suite 200  
Alpharetta, GA 30022 USA

Additionally, where we process your personal information for our interests you will have the right to object to such processing. Please be aware that where you object to this sort of processing it may affect our ability to conduct tasks as listed in this policy.

You may contact us:

- a) by *telephone*, at +1 678 514 3500
- b) by following the *Opt-Out or unsubscribe instruction* contained in the body of any marketing e-mail from us
- c) by sending us an *e-mail* at [DPO@PyramidCI.com](mailto:DPO@PyramidCI.com), including a copy of the e-mail you have received and by typing "Remove" in the subject line of your e-mail.
- d) by *mail*:

Pyramid Consulting Inc.  
Attention: Pyramid Data Protection Officer  
3060 Kimball Bridge Rd. Suite 200  
Alpharetta, GA 30022 USA

Your election not to receive newsletters or promotional and marketing correspondence from us will not: (i) preclude us from corresponding with you, by email or otherwise, regarding your existing or past relationship with us, and (ii) preclude us, including our employees, contractors, agents and other representatives, from accessing and viewing your personal information in the course of maintaining and improving the Site.

### **Requesting Access to Your Personal Information and Other Rights:**

You may also have the right under applicable law to request to review, access, correct, delete, port or object to our processing your personal information processed by us, and lodge a complaint with a supervisory authority. If so, you may do so by making a request to the DPO You may contact us:

- a) by *telephone*, at +1 678 514 3500
- b) by following the *Opt-Out or unsubscribe instruction* contained in the body of any marketing e-mail from us
- c) by sending us an *e-mail* at [DPO@PyramidCI.com](mailto:DPO@PyramidCI.com), including a copy of the e-mail you have received and by typing "Remove" in the subject line of your e-mail.
- d) by *mail*:

Pyramid Consulting Inc.  
Attention: Pyramid Data Protection Officer  
3060 Kimball Bridge Rd. Suite 200  
Alpharetta, GA 30022 USA

## Changes to this Policy

As a high growth, global business, Pyramid will continue to assess this Policy against new technologies, regulations, laws, services, business practices, and the needs of our customers & candidates. Accordingly, changes to this Policy shall be made from time to time as required. Material changes to this policy will result in more prominent notice and may take many forms (such as email, a written hard hard-copy, or updates to our website, as appropriate to regulations, business practices, and customer needs.

## Data Protection Officer

We have appointed a Data Protection Officer (“DPO”) for our global operations to address privacy concerns for our candidates and those who interact with us. If you have any questions or concerns about our personal data policies or practices, you may contact the DPO using the following contact details:

- a) by *telephone*, at +1 678 514 3500
- b) by following the *Opt-Out or unsubscribe instruction* contained in the body of any marketing e-mail from us
- c) by sending us an *e-mail* at [DPO@PyramidCI.com](mailto:DPO@PyramidCI.com), including a copy of the e-mail you have received and by typing “Remove” in the subject line of your e-mail.
- d) by *mail*:

Pyramid Consulting Inc.  
Attention: Pyramid Data Protection Officer  
3060 Kimball Bridge Rd. Suite 200  
Alpharetta, GA 30022 USA

## Cookie Policy – Automatic Data Collection

By browsing on our Site, you are agreeing to our use of cookies.

### What is a Cookie:

A cookie is a small text file that a website stores on your personal computer, telephone, or any other device, with information about your navigation on that website. Cookies facilitate browsing and make it more user-friendly. A cookie contains the name of the server it came from, the expiry of the cookie, and a value – usually a randomly generated unique number. Cookies do not give access to nor damage your computer.

### How we use Cookies:

We use browser session cookies, which are temporary cookies that are erased from your device’s memory when you close your Internet browser or turn your computer off, and persistent cookies, which are stored on your device until they expire, unless you

delete them before that time. We group browser cookies on our site into three categories, which you can manage through our Cookie Preference Manager:

- **Strictly necessary cookies:** These cookies are necessary to enable the basic features of this site to function, such as identifying you as a valid user, ensuring that no one else can sign on simultaneously with your account from another computer and helping us serve you better based on your registration preferences. These cookies also allow you to select your cookie preferences.
- **Performance Cookies:** These performance tracking cookies help us to track whether an e-mail recipient has completed an event, such as signing up for a free trial for example. Such information is non-personally identified and collected on an aggregate level. We sometimes utilize third-party service providers to help us track the activity within our Site and require third parties to comply with all applicable regulations and laws.
- **Functional cookies:** Cookies allow us to analyze your use of the site to evaluate and improve our performance. They may also be used to provide a better customer experience on this site. For example, providing us with information about how our site is used and helping us facilitate any promotions or surveys that we provide.
- **Targeting cookies:** These cookies may be used to share data with advertisers so that the ads you see are more relevant to you, allow you to share certain pages with social networks, or allow you to post comments on our site.

#### **Cookies Are Not Used to Store Sensitive Data:**

The cookies we use do not store sensitive personal information, such as your address, your password, or your credit card data.

#### **Performance Tracking**

We sometimes use cookies, as well as tracking technology, such as web beacons, within the promotional emails that we send to our subscribers or advertisements for our Site. These performance tracking devices help us to track whether an e-mail recipient has completed an event, such as signing up for a free trial for example. Such information is non-personally identifying and collected on an aggregate level.

We sometimes utilize third party service providers to help us track the activity within our Site. These third parties may use temporary cookies and/or web beaconing technology to facilitate such tracking, but the data would not be tracked in a personally identifiable way.



Third parties whose products or services are accessible on our Site may also use cookies, and we advise you to check their privacy policies for information about their cookies and other privacy practices.

If you would like more information about the third-party cookies on our website and to find out more about your choice to not have your information used by third parties, please contact us at [DPO@PyramidCI.com](mailto:DPO@PyramidCI.com).

## **Managing Your Cookie Preferences**

### **Cookie Preference Manager:**

Our preference manager allows you to restrict our use of cookies other than Required Cookies. If you use our preference manager on a mobile device, we process your device's Advertising Identifier. When you access our preference manager, persistent cookies will be set by the ad networks listed in our preference manager to honor your preferences if you choose not to receive interest-based advertising. If you clear your browser cookies, this will remove all cookies including the opt-out cookies set by the companies. You will need to re-access the opt-out tool to reset your preferences. Our cookie only knows your last set of preferences and does not reflect the current state of cookies on your browser.

### **Do Not Track:**

Pyramid tracks cookies through your browser unless you proactively disable cookie tracking, or use the features of our Cookie Preference Manager.

### **Avoiding Use of Cookies on this Site:**

If you prefer to completely prevent us from using cookies on your devices, before navigating on this Site, you must first disable the use of cookies in your browser and then delete the cookies saved in your browser associated with this Site.

### **Disabling and Preventing Further Use of Cookies:**

You may restrict, block, or delete the cookies from this Site at any time by changing the configuration of your browser.

### **Contact Us**

You are always free to contact us if you have questions or concerns regarding this Policy, have a question or problem related to your use of the Site, or wish to exclude your personal information from our direct marketing purposes. Our standard business practice is to retain any communications from our Site visitors to help us to serve each of you better.

You may contact us by emailing [DPO@PyramidCI.com](mailto:DPO@PyramidCI.com) or by writing to us at:



Pyramid Consulting Inc.  
Attention: Pyramid Data Protection Officer  
3060 Kimball Bridge Rd. Suite 200  
Alpharetta, GA 30022 USA



# CCPA

## Document Change Record

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2/1/2020	1	Group	Initial Document
1/17/2023	1.1	Marc Cohen/Iain Struan/Ramesh Maturu	Incorporate CCRA and legal updates
7/10/2023	1.2	Marc Cohen/Iain Struan/Ramesh Maturu	Review and Updates

# CA Consumer Privacy Act Policy and California Privacy Rights Enforcement Act Introduction

## What are CCPA and CPRA?

The California Consumer Privacy Act (“CCPA”) was enacted in 2018 and took effect on January 1, 2020. It confers new privacy rights for consumers and imposes corresponding obligations on businesses subject to it.

On November 4, 2020, California voters passed the California Privacy Rights and Enforcement Act (CPRA). The CPRA replaces and amends several parts of the existing Act, the California Consumer Privacy Act (CCPA). The new Act went into effect on January 1, 2023.

## CCPA vs CPRA – What has changed?

The new data privacy act, California Privacy Rights Act (CPRA), expands on several areas of the existing CCPA. CPRA introduces new privacy rights for California’s people and adds more stringent regulations for businesses on the use of personal information. The CPRA has also established a new

government agency for the enforcement of data privacy laws in California, named the California Privacy Protection Agency (CPPA). CPRA:

- expands the definition of “businesses” covered by the privacy act and includes those “sharing” information as liable as well. Commonly controlled businesses or businesses sharing common branding are exempted unless they also share consumers’ personal information.
- introduces a new classification of personal information (PI), named sensitive personal information (SPI) that has additional use, disclosure, and opt-out requirements. This includes details like Social Security, state ID, driver’s license, financial account information, precise geolocation, religious or philosophical beliefs, non-public communication, genetic, biometric, and health data, etc.
- requires companies holding high-risk data to conduct annual cybersecurity audits, the results of which must be submitted to the CPPA.
- expands on the CCPA’s right to opt-out and states that companies must allow consumers the right to opt-out of third-party sharing for advertising purposes.
- strengthens consumers’ rights by adding the right to delete or correct their personal information. If the said PI has been shared with third parties by the business, the business must notify them of the request to delete/amend as well.
- expands on the consumers’ right to know provisions in the CCPA.
- introduces changes in data governance and transparency, including limitations on storage, data minimization, and contract requirements. Only data that is necessary for the purpose stated by the business must be collected, used, or disclosed. Also, data must be retained only for as long as it is necessary for the said purpose.

## How does the CPRA compare with the CCPA?

The CPRA can be called a refinement or upgrade of the CCPA. The CCPA formed the basis of the data privacy landscape of California. The CPRA builds



upon it to strengthen the privacy regulations in the State and bring it to par with the GDPR of the European Union.

The CPRA does not replace the CCPA per se, but surely amends it to benefit consumers and increase the compliance requirements for small and big businesses alike.

Though the CPRA went into effect on January 1, 2023, any data collected by businesses from January 1, 2022, will be subject to compliance with the CPRA. This is termed as the lookback period.

Pyramid Consulting, Inc. is committed to protecting and respecting your privacy. This Privacy Policy for California residents (“Policy”) applies to personal information collected through our websites, applications, services, and in the course of routine offline business contact with you. It applies solely to all visitors, users, and others who reside in the State of California (“consumers,” “your,” or “you”).

This Policy has been adopted to comply with the CCPA/CPRA and any terms defined in the CCPA/CPRA have the same meaning when used in this Policy. The terms “we,” “us,” and “our” refer to Pyramid Consulting, Inc., and our operating affiliate divisions (Genspark™ and Celsior Technologies™) (the “Company”).

## How will the CPRA impact businesses?

Like any other comprehensive data privacy law, the CPRA also requires businesses to be more responsible with consumers’ personal information. Businesses will need to develop stronger data protection processes and controls to be able to respond to consumer requests quickly. Businesses will also need to be agile and adaptive enough to pivot in case of any new additions to the data privacy compliance requirements in the future.

## What Personal Information do we collect?

For purposes of this Policy, “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with California consumers.



We may collect Personal Information from you in a variety of different situations, including, but not limited to, through our websites, your mobile device, through email, in physical locations, through the mail, and/or over the telephone.

We collect Personal Information to operate, manage, and maintain our business, to provide our services, and to accomplish our business purposes and objectives. In particular, we may have collected the following categories of Personal Information from consumers within the last twelve (12) months:

- Identifiers, such as names and government-issued identifiers (e.g., Social Security numbers);
- Personal Information categories listed in the California Customer Records statute, such as contact information and financial information;
- Characteristics of protected classifications under California or federal law, such as sex;
- Biometric/Genetic information, such as fingerprints and voiceprints;
- Internet or network activity information, such as browsing history and interactions with our websites;
- Geolocation data, such as device location and Internet Protocol (IP) location;
- Audio, electronic, and similar information, such as call and video recordings;
- Professional or employment-related information, such as work history and prior employers;
- Education information, such as student records, grades, and transcripts; and
- Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics.
- Personal data revealing racial or ethnic origin, religious beliefs, mental or physical health diagnosis, sexual orientation, or citizenship or immigration status. Some of this information is typically included in resumes or can be derived from information contained in resumes.

**Personal Information does not include:**

- Publicly available information from government records;
- De-identified or aggregated consumer information;
- Information excluded from the CCPA's scope, such as: health or medical information covered by the Health Insurance Portability and Accountability Act of 2009 (HIPAA), the California Confidentiality of Medical Information Act (CMIA), or clinical trial data; personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA), or the California Financial Information Privacy Act (FIPA); and the Driver's Privacy Protection Act of 1994.

**The categories of sources from which we collected the Personal Information listed above include, but are not limited to:**

- Directly from job candidates/applicants and employees;  
For example, when they
  1. Contact the Company by phone, email, or otherwise in respect of any of its services;
  2. Apply for assignments that the Company has advertised on behalf of its clients or itself; and
  3. Complete contract assignments at client sites, including logs of work completed and hours worked.
- Sources such as LinkedIn, corporate websites, job board websites, online CV libraries, business cards, personal recommendations, and the Company's websites;
- Service providers, including external payroll service providers, and other third parties;
- Directly from clients, contractors, or their agents. For example, from information clients provide in relation to the services for which they engage the Company.

**How do we use Personal Information?**

We may use or disclose the Personal Information we collect for one or more of the following business purposes:



1. **Job Candidate/Applicant Information** – We generally use the Personal Information about job candidates/applicants in the following ways:
  1. **Recruitment Services** – Because a significant area of our business is providing recruitment services, we have listed below numerous ways in which we may use and process Personal Information for this purpose, when appropriate and in accordance with any legal requirements. This list is not exhaustive.
    - Collecting the information from job candidates/applicants and other sources, such as LinkedIn;
    - Storing the information (and updating it when necessary) in our databases, so that we can contact job candidates/applicants in relation to recruitment;
    - Providing job candidates/applicants with our recruitment services and to facilitate the recruitment process;
    - Assessing information about job candidates/applicants to compare it against vacancies that we think might be suitable for them;
    - Sending job candidates'/applicants' information to clients, to apply for assignments or to assess their eligibility for assignments;
    - Enabling job candidates/applicants to submit their CVs, apply online for jobs, or subscribe to alerts about jobs that might be of interest to them;
    - Carrying out our obligations arising from any contracts entered into between the Company and job candidates/applicants;
    - Carrying out our obligations arising from any contracts entered into between the Company and third parties in relation to job candidates'/applicants' recruitment;
    - Facilitating our payroll and invoicing processes;

- Verifying the details that job candidates/applicants have provided, using third party resources or by requesting additional information;
  - Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties; and
  - Processing job candidates'/applicants' information to enable us to send them targeted, relevant marketing materials or other communications which we think are likely to be of interest to them.
2. **Marketing Activities** – We may use Personal Information for the purposes listed below, when appropriate and in accordance with any legal requirements. This list is not exhaustive.
- Enabling us to develop and market other services; and
  - Marketing our full range of recruitment services (permanent, temporary, contract, Managed Service Provider programs, etc.) to job candidates/applicants.
3. We may use Personal Information to help us comply with legal or regulatory requirements for job candidates/applicants, including government reporting, investigations, legal proceedings, record-keeping, and for audit purposes.
- **Employee Information** – We use the Personal Information of our employees for remuneration, taxation, pension, and benefits purposes. The information requested is necessary for the performance of our obligations under their employment contracts. If employees do not provide the information requested, we will be unable to pay them their wages, provide or register them for benefits, or facilitate claims for benefits. We may also process Personal Information as part of performance review processes and in relation to compensation, rewards, and benefits. We also keep employee training records. We



may also need to process Personal Information in connection with disciplinary, grievance, and dismissal processes. Additionally, we may use Personal Information to help us comply with legal or regulatory requirements for employees, including government reporting, investigations, legal proceedings, record-keeping, and for audit purposes.

- **Contractor Information** – We may use the Personal Information about our contractors to:
  - Store (and update when necessary) their details on our databases, so that we can contact them in relation to our agreements;
  - Offer services to them or obtain support and services from them;
  - Perform certain legal obligations; and
  - Help us to establish, exercise, or defend legal claims.

We may also use Personal Information to facilitate administrative functions, information technology operations, for legal reasons, and corporate transactions. These functions include, but are not limited to the following:

- To manage and operate information technology and communications systems, risk management and insurance functions, budgeting, fiscal management and reporting, and strategic planning;
- To manage litigation and other legal matters and inquiries, and to meet legal and regulatory requirements;
- In connection with corporate transactions, sales, or assignments of assets; and mergers, divestitures, or other changes of control or of financial status of the Company or its subsidiaries or affiliates; and
- To manage licenses, permits, and authorizations applicable to our business operations.

## **With whom do we share Personal Information?**

When appropriate and in accordance with legal requirements, we may share Personal Information in several ways and for distinct reasons, including, but not limited to:

- Any of our group of companies;

- Individuals and organizations who hold information related to job candidates'/applicants' references or applications to collaborate with us, such as current, past, or prospective employers, educators, examining bodies, and employment and recruitment agencies;
- Tax, audit, or other authorities, when we believe in good faith that the law or a regulation requires us to share this information;
- Third party service providers who perform functions on our behalf;
- Third party outsourced payroll providers when we have an appropriate processing agreement (or similar protections) in place;
- For job candidates/applicants:
  - Potential employers and other recruitment agencies/organizations to increase the candidates'/applicants' chances of finding employment;
  - Third party partners, job boards, and job aggregators when we consider this will improve the chances of finding them the right job.
- Managed Service Provider (MSP) suppliers as part of our clients' MSP programs; and
- Vendor Management System (VMS) suppliers as part of workorder tracking, time capturing services for our clients.

## What are your CCPA rights?

The CCPA provides certain consumers with specific rights regarding their Personal Information which they may exercise independently or through an authorized agent. It also includes several exemptions, however. For example, Personal Information about consumers who are current or former employees, job applicants, or contractors is generally exempt from, or outside the scope of, this section.

The consumers who have these rights under the CCPA may exercise them in the following manner:

### 1. **Right to Access Information**

Consumers with these rights under the CCPA may request access to the Personal Information that we have collected and maintained about them (along with information regarding its use and disclosure) over the past twelve (12) months upon

appropriate verification. They may make such requests two (2) times every twelve (12) months.

## 2. Right to Deletion of Information

Consumers with these rights under the CCPA may request that we delete Personal Information collected and maintained about them, subject to certain exceptions. Once their request is verified and we have determined that we are required to delete that information in accordance with applicable law, we will delete their Personal Information accordingly. Any deletion request may be denied if it is necessary for us to retain the information under one or more of the exceptions listed in the CCPA, such as complying with a legal obligation.

Please note that a record of the deletion request may be kept pursuant to our legal obligations.

- **Right to Non-Discrimination**

We will not discriminate against you for exercising any of your rights under the CCPA.

## How to make requests?

Consumers who have access and deletion rights under the CCPA may exercise these rights by submitting a verifiable consumer request using one of the methods described below.

- Email us at [dpo@pyramidci.com](mailto:dpo@pyramidci.com).
  - Make the subject line of your email "CCPA Information/Deletion Request."
  - Include your first and last name.
  - Identify which type of request you are seeking by including one of the following sentences in your email:
    1. This is a request to know categories of my Personal Information; or
    2. This is a request to know specific pieces of my Personal Information; or
    3. This is a request to delete my Personal Information.
  - Include this declaration: *"I affirm that the information provided in this email is accurate, that I am the person whose full name is*



*specified above, and that I am the owner of this email account and a California resident. I understand that the Company will contact me at the email address provided to verify I am the person making this request."*



# Web Accessibility

## Document Change Record

Date	Version	Author	Change Details
6/30/2022	1	Marc Cohen/Ramesh Maturu	Initial
7/10/2023	1.1	Marc Cohen/Praveen Kumar/Iain Struan/Ramesh Maturu	Modifications due to new website release



Pyramid Consulting, Inc. is committed to providing a website that is accessible to everyone, including individuals with disabilities. We are constantly working towards improving the accessibility of our website to ensure that we provide equal access to all of our users.

## What we are doing about web accessibility

To make our website accessible to everyone, we have implemented the following features, among others:

- Screen reader compatibility
- Alt-tagged images
- Keyboard accessible navigation
- Adjustable font size
- Adjustable color/contrast ratio
- Labelled form controls
- Sitemap
- Search function

Our website is compatible with the most popular free accessibility software and services, including:

- [JAWS](#), a screen reader for Windows.
- [NVDA](#), an open-source screen reader for Windows.
- [Lynx](#), a text-only web browser for blind users with refreshable Braille displays. Compatible with Windows, Macintosh, Linux, and other operating systems.
- [Links](#), a text-only web browser for visual users with low bandwidth. Compatible with Windows, Linux, and other operating systems.

Instructions for increasing or decreasing the size of text and images.

Microsoft Internet Explorer:

- Press the **Alt** key to display the menu bar, click **View**, and then click **Text Size**; or

- Press and hold down the **CTRL** key, and while holding the **CTRL** key, press the **+** key to increase the size of the text and images or press the **-** key to decrease the size of the text and images.

#### **Mozilla Firefox:**

- Press the **Alt** key to display the menu bar, click **View**, then go to **Zoom**.
- Select **Zoom Text Only** to adjust the size of the text.

#### **Apple Safari (OS X):**

- To enlarge the entire page, choose **View > Zoom In**, or press **Command (⌘)** and the **+** key.
- To enlarge only the text, choose **View > Zoom Text Only**, and then choose **View > Zoom In**.

#### **Google Chrome:**

- Click the Chrome menu on the browser toolbar.
- Select **Settings**.
- Click **Show Advanced Settings**.
- In the “Web Content” section, use the **Font Size** drop-down menu to make adjustments.

## **Instructions for adjusting the color/contrast on our website.**

#### **Microsoft Internet Explorer:**

- Select the **Tools** menu (Shortcut: **ALT + X**).
- Select **Internet Options**.
- Select the **Colors** button in the bottom left-hand corner (Shortcut: **ALT + O**).
- Ensure the “**Use Windows colors**” check box is not selected (Shortcut: **ALT + W** to toggle on/off).
- Choose your desired colors by selecting the color box and then choosing from the available colors. You can change the colors for text, background, visited and unvisited hyperlinks and hover.
- Select **OK** on the Colors screen.
- Select **OK** on the Internet Options screen.

#### **Mozilla Firefox:**

- Select the **Tools** menu (Shortcut: **ALT + T**).

- Select **Options**.
- Select the **Content** option in the top-middle of the menu.
- Select the **Colors** button on the middle, right-hand side.
- Choose your desired colors by selecting the color box and then choosing from the available colors. You can change the colors for text, background, and visited and unvisited hyperlinks.
- Uncheck the **Use system colors** box.
- Select **OK** on the Colors screen.

#### Apple Safari (OS X):

- Select the **Safari** menu, then select **Preferences**.
- Select **Appearance**, which is the second option on the right.
- Under **Standard font**, select the **Select** button. Choose your desired font type, size, and color.
- Click **OK** on the **Preferences** screen.

#### Google Chrome:

Google makes available extensions that allow you to adjust the colors of Google Chrome, which you can find on the Google Chrome Extensions website. Simply visit the website and search for “color change.”

- When you find the extension you would like, click Add to Chrome for installation.
- Once installed, you will see the icon for the extension at the end of the URL field.
- Right-click on the icon, and you will be able to change the background color, text color, links color, and visited links color.

## Questions or feedback

If you have any questions or feedback regarding the accessibility of this site, or if you experience any difficulty using it, please contact us at [marketing@pyramidci.com](mailto:marketing@pyramidci.com) and we will be happy to help.